

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Public Safety and Homeland Security	)	PS Docket No. 19-254
Bureau Seeks Comment on Petitions Filed	)	
by the Boulder Regional Emergency	)	
Telephone Service Authority	)	

**REPLY COMMENTS OF T-MOBILE USA, INC.**

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T-Mobile USA, Inc. (“T-Mobile”)<sup>1/</sup> submits these reply comments in response to petitions in the above-referenced proceeding submitted by the Boulder Regional Emergency Telephone Service Authority (“BRETSA”) regarding interoperability issues related to the National Public Safety Broadband Network (“NPSBN”) operated by the First Responder Network Authority (“FirstNet”).<sup>2/</sup>

**I. BACKGROUND AND SUMMARY**

Because of ongoing concerns about interoperability between the NPSBN and networks used by other public safety entities, BRETSA submitted the Petitions, asking the Commission to issue a declaratory ruling that “interoperability is a fundamental responsibility of FirstNet and that [it] is supported at all levels, including network, services, applications and devices.”<sup>3/</sup> BRETSA also requested that the Commission issue a notice of proposed rulemaking or inquiry on how to address issues related to “roaming and prioritization as it applies to applications” such

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<sup>1/</sup> T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

<sup>2/</sup> *Boulder Regional Emergency Telephone Service Authority Petition for Reconsideration, or in the Alternative, Petition for Declaratory Ruling and Petition for Rulemaking*, PS Docket No. 16-269 (filed Nov. 21, 2018) (the “Petitions”); *Public Safety and Homeland Security Bureau Seeks Comment on Petitions Filed by the Boulder Regional Emergency Telephone Service Authority*, Public Notice, PS Docket No. 19-254, DA 19-902 (rel. Sept. 11, 2019).

<sup>3/</sup> *Petitions* at 8.

as push-to-talk and mission-critical push-to-talk, “as well as other applications that will face the same issues.”<sup>4/</sup> BRETSA stated that, absent Commission intervention, FirstNet would become “just another competitor in the public safety radio space leveraging market share on interoperability.”<sup>5/</sup>

In response, the overwhelming majority of commenters supported Commission action to more completely implement Congress’s primary objective in creating the NPSBN – ensuring that first responders are able to fully communicate and collaborate with one another regardless of jurisdiction. In contrast, AT&T and FirstNet were the only parties that advocated for an unnecessarily restrictive view of statutory wording and the Commission’s authority that would frustrate Congressional intent. Not all public safety entities will use FirstNet, and even those that do may not use FirstNet for all their public safety communications needs. In order to ensure that these public safety entities can – as Congress envisioned – communicate with other agencies and other jurisdictions, they must have access to the NPSBN. The Commission has the authority to impose obligations on FirstNet – a Commission licensee – consistent with Congressional directive. Therefore, instead of adopting AT&T and FirstNet’s approach, the Commission should grant the Petitions and seek further input from first responders, public safety broadband service providers, and other relevant stakeholders to ensure that public safety agencies, regardless of jurisdiction or provider, are able to fully coordinate and communicate in emergency responses.

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<sup>4/</sup> *Id.* at 8-9.

<sup>5/</sup> *Id.* at 5.

## **II. AT&T AND FIRSTNET’S LIMITED VIEW OF THEIR OBLIGATIONS UNDERMINES CONGRESSIONAL INTENT**

Commenters agree that when Congress created FirstNet to build and operate the NPSBN in 2012,<sup>6/</sup> it did so in response to one of the core recommendations of the 9/11 Commission – to ensure that first responders are able to communicate with one another, in any situation, regardless of their agency affiliation.<sup>7/</sup> Any action the Commission or FirstNet takes must be viewed through that lens and any further directives must fulfill that intent. It is contrary to the public interest to assert that the Commission should interpret statutory wording so narrowly as to restrict public safety entities’ access to the NPSBN and its coordination capabilities simply because they chose a competing provider for their service.

### **A. AT&T and FirstNet’s Approach to Interoperability Frustrates Congress’s Intent for the NPSBN.**

#### **1. Cross-Agency and Jurisdiction Communication is Critical to Achieving Governmental Goals in Creating FirstNet.**

In emergency situations requiring responses from multiple agencies and jurisdictions, it is critical that first responders be able to share incident command structures and coordination/control of communications across jurisdictions. The inability to do so puts lives at risk. It was the recognition of this problem that led directly to Congress’s decision to create FirstNet.<sup>8/</sup> As the Commission’s own Technical Advisory Board for First Responder Interoperability (“TABFR”), created to ensure the aims for FirstNet were achieved, noted:

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<sup>6/</sup> Middle Class Tax Relief and Job Creation Act (47 U.S.C. § 1401 et seq.) (“2012 Spectrum Act”).

<sup>7/</sup> See *Comments of Mutualink, Inc.*, PS Docket No. 19-254, at 1 (filed Sept. 26, 2019) (“*Mutualink Comments*”); *Comments of Verizon*, PS Docket No. 19-254, at 5 (filed Sept. 26, 2019) (“*Verizon Comments*”). See also National Commission on Terrorist Attacks Upon the United States, *Final Report*, at 292-93, 397 (July 22, 2004). See also 158 Cong. Rec. 27,915 (referring to the creation of FirstNet as “the last major piece of unfinished business from the attacks on 9/11”); *id.* at 920 (referring to FirstNet as “this Congress answer[ing] the call that has been pending since 9/11”).

<sup>8/</sup> *Id.*

Coordinated response, across agency lines, including multiple disciplines, is necessary to protect the communities and citizens the public safety community is charged to serve . . . The [public safety] communications network spans cities, counties and in some cases state borders. Without reliable and interoperable communications, the safety of our nation’s first responders becomes jeopardized and the ability to perform their critical mission is compromised. These concerns continue to be of critical importance to first responders.<sup>9/</sup>

Similarly, FEMA’s 2018-2022 Strategic Plan makes clear that interoperability and redundancy are critical: “If we cannot effectively and reliably communicate with our partners, we cannot coordinate with them and we cannot direct Federal support to where it is needed most . . . The inability to communicate hinders operational coordination, creating information gaps and increasing the likelihood of overutilization or misallocation of limited resources.”<sup>10/</sup>

Commenters agree. BRETSA noted the longstanding practice of “bringing a laundry basket of radios” to interagency operations as a band-aid solution that fails to adequately address the problem of interagency communications.<sup>11/</sup> The Minnesota Department of Public Safety similarly pointed to “interoperability challenges” as being a serious concern for public safety and described the “substantial human and capital resources [devoted] to address this issue throughout the State.”<sup>12/</sup> Mutualink called the limited ability of different agencies to communicate and coordinate in emergencies a “well-known (and today still persistent) public safety agency

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<sup>9/</sup> Technical Advisory Board for First Responder Interoperability, *Recommended Minimum Technical Requirements to Ensure Nationwide Interoperability for the Nationwide Public Safety Broadband Network*, Final Report, at 1.2 (2012) (“TABFR Report”).

<sup>10/</sup> Federal Emergency Management Agency, *Strategic Plan: Helping People. Together*, 2018-2022 Strategic Plan, at 25, [https://www.fema.gov/media-library-data/1533052524696-b5137201a4614ade5e0129ef01cbf661/strat\\_plan.pdf](https://www.fema.gov/media-library-data/1533052524696-b5137201a4614ade5e0129ef01cbf661/strat_plan.pdf).

<sup>11/</sup> *Comments of the Boulder Regional Emergency Telephone Service Authority*, PS Docket No. 19-254, at 2 (filed Sept. 26, 2019) (“BRETSA Comments”).

<sup>12/</sup> *Comments of Minnesota Department of Public Safety Emergency Communication Networks*, PS Docket No. 19-254, at 2 (filed Sept. 26, 2019) (“Minnesota Comments”).

problem.”<sup>13/</sup> Pennsylvania’s FirstNet authority argued that lack of interoperability “risks failures in communications, impedes emergency response, and could threaten the lives of first responders and the citizens they’re sworn to protect,” and noted that “FirstNet cannot fulfill [its] mission” of “reliable, effective, interoperable communications” without interoperability with other networks.<sup>14/</sup> Southern Linc and C Spire noted that continued lack of interoperability “frustrate[s] the ability of public safety officials to make informed decisions . . . and ultimately threaten[s] the ability of public safety to protect the public in times of emergency.”<sup>15/</sup>

## **2. AT&T and FirstNet’s Approach Undermines the Achievement of These Goals.**

Despite clear Congressional intent in creating FirstNet, and all the resources expended in its design and deployment, its fundamental purpose – to enable public safety entities to communicate across agencies and jurisdictions – will be undermined if the Commission adopts AT&T and FirstNet’s interpretation of “interoperability.” To the contrary, the Commission should ensure that public safety entities that use other carriers’ network are able to access the NPSBN and fully communicate and coordinate with public safety entities using the NPSBN. AT&T and FirstNet have argued, both publicly and in this proceeding, that the only interoperability required by the Act is between different components of FirstNet.<sup>16/</sup> Because

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<sup>13/</sup> *Mutualink Comments* at 1.

<sup>14/</sup> *Comments of Major Diane M. Stackhouse*, PS Docket No. 19-254, at 1 (filed Oct. 7, 2019) (“*Pennsylvania Comments*”).

<sup>15/</sup> *Comments of Southern Communications Services, Inc. and Cellular South*, PS Docket No. 19-254, at 2 (filed Sept. 26, 2019) (“*Southern Linc and C Spire Comments*”).

<sup>16/</sup> *See generally Comments of AT&T*, PS Docket No. 19-254 (filed Sept. 26, 2019) (“*AT&T Comments*”) and *Comments of the First Responder Network Authority to the Boulder Regional Emergency Telephone Service Authority’s Petitions for Declaratory Ruling and Rulemaking*, PS Docket No. 19-254 (filed Sept. 26, 2019) (“*FirstNet Comments*”). *See also BRETSA Comments* at 1 (citing public statements by FirstNet representatives that only FirstNet subscribers will get all interoperability features).

FirstNet chose a single carrier to construct the NPSBN nationwide, and because no State governments opted-out of FirstNet, they claim there is functionally no interoperability requirement on FirstNet today.

However, not every public safety entity will use FirstNet as its communications provider, and even those that use FirstNet may also use other carriers for some operations. As commenters pointed out, there are a variety of commercial public safety offerings – AT&T’s FirstNet network is only one of them – and there are many reasons a particular public safety entity might choose not to use the NPSBN for its public safety communications. Verizon noted that many state governments have rules requiring “meaningfully competitive procurements” and that there are “substantial reasons for not entering into exclusive contracts for their public safety wireless services.”<sup>17/</sup> Southern Linc and C Spire similarly pointed out that “public safety agencies find value in relying on a multiplicity of vendors.”<sup>18/</sup> The Digital Decision agreed, stating that, in its view, public safety agencies will continue to rely on multiple providers, requiring interoperability for cross-agency coordination.<sup>19/</sup> Public safety entities should not lose the ability to coordinate with other jurisdictions – the primary goal of Congress in creating FirstNet and the NPSBN in the first place – simply because they did not elect to use FirstNet for some or all of their requirements.

Commenters note that by taking an impermissibly narrow view of its interoperability obligations, FirstNet is creating “another walled garden” or “another silo” in the public safety

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<sup>17/</sup> *Verizon Comments* at 4.

<sup>18/</sup> *Southern Linc and C Spire Comments* at 4.

<sup>19/</sup> *Comments of the Digital Decision*, PS Docket No. 19-254, at 3 (filed Sept. 26, 2019) (“*Digital Decision Comments*”).



space, rather than acting as a “universal mediator” as Congress intended.<sup>20/</sup> Indeed, this will perpetuate exactly the problem that the NPSBN was created to solve – the creation of artificial barriers to communication and coordination between jurisdictions attempting to work together in a crisis situation that puts lives at risk.

Perhaps even more troubling, FirstNet and AT&T seem to be actively *highlighting* this limitation and using it as a way to promote their service. BRETSA noted public statements made by FirstNet representatives on interoperability, and remarked that FirstNet has “market incentives” to leverage its position to increase sales.<sup>21/</sup> Mutualink also criticized this approach as “protectionary market maneuvering” that undermines public safety,<sup>22/</sup> and Southern Linc and C Spire noted that AT&T “appears to be following” in the path of past public safety radio vendors who leverage limited interoperability “to drive their own market share.”<sup>23/</sup> The Commission must not allow an entity entrusted with a critical public safety obligation to place its financial interests first.<sup>24/</sup>

To address AT&T and FirstNet’s approach, commenters have asked the Commission to ensure “full interoperability” between FirstNet and other carriers’ service, and explained why their specific requests are critical to achieving the coordination and communication goals of Congress. Verizon called for “reciprocal commitments and capabilities” – in particular, priority and preemption levels and protocols.<sup>25/</sup> BRETSA argues that interoperability should be

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<sup>20/</sup> *Mutualink Comments* at 4. *See also BRETSA Comments* at 1.

<sup>21/</sup> *BRETSA Comments* at 1.

<sup>22/</sup> *Mutualink Comments* at 4.

<sup>23/</sup> *Southern Linc and C Spire Comments* at 5.

<sup>24/</sup> If AT&T is fostering an environment of non-interoperability to promote unrelated commercial offerings on AT&T’s network or gain advantage in the use of its Band 14 spectrum for commercial purposes, the Commission should be even more concerned.

<sup>25/</sup> *Verizon Comments* at 6-7.

“supported at all levels, including network, service, applications, and devices.”<sup>26/</sup> Pennsylvania’s FirstNet authority asked that the Commission ensure that all public safety networks “follow the same priority protocols and . . . that public safety applications . . . work consistently for all responders regardless of the network they use.”<sup>27/</sup> And Southern Linc and C Spire echoed the call made by others for “priority and preemption protocols, applications, local control, non-mission-critical and mission-critical PTT communications, and off-air device-to-device communications.”<sup>28/</sup> These requests more closely align with Congress’s intent in creating FirstNet, in contrast to AT&T and FirstNet’s overly narrow approach that would impede full inter-network public safety communications.

**B. AT&T and FirstNet’s Approach to Roaming Will Also Undermine the Utility of the NPSBN.**

FirstNet asserts that only roaming *from* the NPSBN to other networks is addressed in the 2012 Spectrum Act, and that even that form of roaming is completely at its discretion.<sup>29/</sup> While the 2012 Spectrum Act admittedly only addresses roaming on to other commercial networks, the public interest requires that roaming *from* other commercial networks *to* FirstNet be available for all the reasons noted above. Rather than adhere to FirstNet’s overly restrictive view of its obligations, the Commission should intervene to ensure the public interest and Congress’s intent are prioritized.

Redundancy in communications is a critical component of preparing for emergency situations, and the most effective way of ensuring redundancy is by establishing cross-carrier

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<sup>26/</sup> *BRETSA Comments* at 2.

<sup>27/</sup> *Pennsylvania Comments*.

<sup>28/</sup> *Southern Linc and C Spire Comments* at 4.

<sup>29/</sup> *FirstNet Comments* at 6-7.

roaming for public safety. Commenters agree. For example, Verizon noted that redundancy is one of many reasons a jurisdiction may decline to rely exclusively on FirstNet for its wireless services.<sup>30/</sup> And, as discussed above, FEMA made clear that reliability in public safety communications is critical, meaning robustness and redundancy should be promoted.<sup>31/</sup>

Expecting all public safety communications to rely on one network, regardless of how secure and robust it may be in theory, is poor planning and contrary to Congressional intent, and the most effective way to achieve true security and robustness is by ensuring that public safety devices, no matter the carrier on which they generally operate, are able to roam across networks. Last year, following Hurricane Michael, all wireless networks, including AT&T's commercial and FirstNet networks, suffered outages in different parts of the Southeast, and wireless carriers worked to restore their networks.<sup>32/</sup> While there may have been times when all coverage was unavailable from any carrier in a particular area, many locations were served by one or more, but not all, carriers. Complete roaming capabilities for public safety users will help address this issue by ensuring that if any carrier capable of supporting public safety roaming traffic is available, there can be public safety coverage in that area, regardless of whether FirstNet itself is capable for providing service. If FirstNet is unwilling to voluntarily cooperate with carriers to enter into reasonable agreements that facilitate that capability, the Commission should use its

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<sup>30/</sup> *Verizon Comments* at 4. *See also Comments of Ryan Poltermann*, P.S. Docket No. 19-254 (filed Sept. 23, 2019) (noting that “many agencies choose to spread their operation across multiple carriers to achieve their required level of redundancy and resiliency necessary to support their life-saving missions. While AT&T has made efforts to cover as much of the country as possible, public safety demands complete redundancy and thus access to multiple cellular networks.”).

<sup>31/</sup> *Supra* n. 7.

<sup>32/</sup> Public Safety and Homeland Security Bureau, *October 2018 Hurricane Michael's Impact on Communications: Preparation, Effect, and Recovery*, PS Docket No. 18-393, at 11-18 (May 2019).

authority to require that it negotiate in good faith to ensure roaming capabilities among carriers that support public safety communications.<sup>33/</sup>

### **III. THE COMMISSION HAS AMPLE AUTHORITY TO ENSURE THAT FIRSTNET IS FULLY COMPATIBLE WITH OTHER CARRIERS' NETWORKS**

The record shows that Congress preserved important roles for the Commission in overseeing FirstNet's performance under the 2012 Spectrum Act. As Verizon noted, FirstNet is a Commission licensee,<sup>34/</sup> over which the Commission enjoys discretion to impose terms and conditions.<sup>35/</sup> There is nothing in the 2012 Spectrum Act that removes from the Commission its general jurisdiction over licensees and their conduct.<sup>36/</sup> In fact, the 2012 Spectrum Act includes an ongoing oversight role for the Commission – in particular, the responsibility to review a renewal application for FirstNet when its current license expires on November 15, 2022 and then every 10 years after.<sup>37/</sup> In the process of reviewing that application, the Commission is directed to determine if FirstNet has met all “duties and obligations” under the 2012 Spectrum Act.<sup>38/</sup> Pursuant to this authority, the Commission has the authority to specify those “duties and obligations,” or, at a minimum, clarify what those “duties and obligations” are. This includes the

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<sup>33/</sup> In addition to the Commission's authority to implement Congress's intent with respect to FirstNet, it has authority to impose roaming obligations on Title II providers. *See Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, Order on Reconsideration and Second Notice of Proposed Rulemaking, 25 FCC Rcd 4181, ¶¶ 64-71 (2010) (“*2010 Roaming Decision*”) (discussing the Commission's authority to impose roaming obligations on CMRS carriers under Titles I, II, and III of the Communications Act).

<sup>34/</sup> *Verizon Comments* at 7.

<sup>35/</sup> *See* 47 U.S.C. § 303(r). *See also 2010 Roaming Decision* at ¶¶ 66-67 (discussing the Commission's Section 303 authority over radio services).

<sup>36/</sup> *See 2012 Spectrum Act* at §§ 6201-6213. Where Congress has granted an agency regulatory authority, a subsequently adopted statute will not be found to have implicitly repealed that authority unless “the intention of the legislature to repeal is clear and manifest.” *Nat'l Ass'n of Home Builders v. Defs. Of Wildlife*, 551 U.S. 644, 662 (2007) (citing *Watt v. Alaska*, 451 U.S. 259, 267 (1981)).

<sup>37/</sup> *See* ULS Call Sign WQQE234; 47 U.S.C. § 1421.

<sup>38/</sup> 47 U.S.C. § 1421.

authority to determine the nature of FirstNet’s interoperability and roaming obligations, as requested in the Petitions, in order to determine if FirstNet is complying with those obligations. The Commission also has a statutory authority to adopt rules as necessary to improve roaming between the NPSBN and commercial networks.<sup>39/</sup>

Further, the TABFR’s rule in clarifying interoperability and roaming demonstrates that the Commission has an important and ongoing role in those issues more generally. Through the TABFR, the Commission played a critical role in developing rules for certain elements of interoperability – those that govern the different components of the NPSBN – and establishing technical rules for roaming.<sup>40/</sup> Had FirstNet selected multiple carriers to build the NPSBN, or had States opted-out of the NPSBN, the Commission would have played an active role in managing interoperability issues. This role did not terminate simply because no states opted-out of FirstNet. In fact, because the TABFR Report may be used as a basis for determining the appropriate level of interoperability and roaming with other carriers’ public safety networks, the Commission is well-suited to this oversight role.

#### **IV. THE COMMISSION SHOULD GRANT THE PETITIONS IN ORDER TO EFFECTUATE CONGRESSIONAL INTENT**

As demonstrated above, Congressional objectives in the 2012 Spectrum Act are not being met by FirstNet’s current policies. The Commission should therefore grant the Petitions, confirm that FirstNet is subject to broader interoperability and roaming obligations than it asserts, and seek comment on exactly what those obligations are and how to achieve them.

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<sup>39/</sup> 47 U.S.C. § 1431.

<sup>40/</sup> *See generally TABFR Report.*

AT&T and FirstNet present appropriate cross-network compatibility questions.<sup>41/</sup> In order to determine how to facilitate interoperability and roaming, the Commission should therefore initiate a rulemaking proceeding, as BRETSA requested, to solicit detailed information on proposals for interoperability and roaming and to receive feedback on how to address those and other issues. The Commission should review commenters' requests for "full interoperability" between the NPSBN and other carriers' service<sup>42/</sup> and assess them against the technical concerns raised by AT&T and FirstNet to arrive at an optimal level of interoperability that best serves the interests of public safety users.

As noted above, the Commission already has produced a roadmap to ensure interoperability in its TABFR Report.<sup>43/</sup> While that report was developed to ensure interoperability between FirstNet components and between FirstNet networks and those administered by States, it can be used as a basis for developing specific interoperability requirements for other carriers' service. As the Interoperability Board Report makes clear, carriers are experienced in ensuring interoperability and seamless roaming, and are well-positioned to apply those lessons to this challenge.<sup>44/</sup> Further, as Verizon and the Interoperability Board Report both note, the Department of Homeland Security has also performed extensive

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<sup>41/</sup> *AT&T Comments* at 7-8; *FirstNet Comments* at 14-16.

<sup>42/</sup> *Supra* p. 7.

<sup>43/</sup> *See generally* TABFR Report.

<sup>44/</sup> *Id.* at 3.1 (noting that "[t]he high level of interoperability achieved on commercial service provider networks did not happen by accident. One critical factor responsible for the high level of interoperability achieved on commercial service provider networks is the process used by the commercial market to develop and maintain technology standards.").

work on public safety interoperability in its SAFECOM program<sup>45/</sup> that can provide insights in resolving the technical issues raised by AT&T and FirstNet.

A rulemaking proceeding will permit first responders, public safety broadband service providers, and other relevant stakeholders to advise the Commission on interoperability and roaming proposals and address any concerns to achieve an appropriate and technically feasible level of compatibility without undermining the goals of the 2012 Spectrum Act. Moreover, the issues are less daunting than AT&T and FirstNet assert.<sup>46/</sup> Only public safety offerings need to be compatible with the NPSBN, dramatically limiting the number of entities which must be included in these efforts.

In contrast to the benefits of a rulemaking proceeding to determine the appropriate level of interoperability with the input of all stakeholders, AT&T's claim that they alone should make these decisions because interoperability requirements imposed by the Commission might result in the expenditure of additional funds must be dismissed.<sup>47/</sup> First, AT&T cannot substitute its judgment for Congress's and the public interest with respect to the value of interoperability and roaming. Second, Congress allocated billions of dollars to achieve its objectives,<sup>48/</sup> and user fees paid to AT&T and FirstNet for use of the NPSBN total billions more.<sup>49/</sup> The comparatively

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<sup>45/</sup> Department of Homeland Security SAFECOM, *Interoperability Continuum*, [https://www.dhs.gov/sites/default/files/publications/interoperability\\_continuum\\_brochure\\_2.pdf](https://www.dhs.gov/sites/default/files/publications/interoperability_continuum_brochure_2.pdf).

<sup>46/</sup> *AT&T Comments* at 8-10.

<sup>47/</sup> *Id.* at 9-10.

<sup>48/</sup> 47 U.S.C. § 1457 (providing for \$7 billion for the buildout by FirstNet).

<sup>49/</sup> See 47 U.S.C. § 1428. See also FirstNet Mobile – Responder & FirstNet Mobile – Responder Unlimited Plans, <https://www.firstnet.com/ecms/dam/att/firstnet/marketing/pdf/firstnet-sub-paid-brochure.pdf> (showing that FirstNet plans run from \$11/month to \$45/month); FirstNet, *FirstNet Momentum: Platform Passes 750,000 Connections* (Aug. 12, 2019), <https://firstnet.gov/newsroom/press-releases/firstnet-momentum-platform-passes-750000-connections-performs-faster-any>.

small amount of money that will likely required to ensure interoperability and roaming is critical to ensure Congress's objectives are met.

## **V. CONCLUSION**

The record in this proceeding makes clear that fulfilling Congress's intent when it adopted the 2012 Spectrum Act and created FirstNet requires interoperability and bi-directional roaming between FirstNet and the networks of other carriers that provide service to public safety entities. Rather than adopting the overly restrictive interpretation of the 2012 Spectrum Act advanced by AT&T and FirstNet, the Commission should grant the Petitions and solicit input from a range of critical stakeholders to address any technical issues required to promote interoperability. Doing otherwise would frustrate Congressional intent, abdicate Commission oversight responsibility, and undermine public safety, putting lives at risk.

Respectfully submitted,

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